

Exhibit 220



Because of national system maintenance by the American Association of Motor Vehicle Administrators (AAMVA), driver's license/ID transactions won't be able to be completed online or at self-service stations from 8 p.m. Saturday, Dec. 14, through 11 p.m. Sunday, Dec. 15. Vehicle transactions will still be available.



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AG, SOS: Plaintiff's report in Antrim County election lawsuit demonstrates lack of credible evidence of widespread fraud or wrongdoing

LANSING – Attorney General Dana Nessel and Secretary of State Jocelyn Benson, in an Antrim County court hearing today, did not object to the public release of a report on Dominion software from the partisan organization Allied Security Operations Group (ASOG), in order to demonstrate the "report" is actually another in a long stream of misguided, vague and dubious assertions designed to erode public confidence in the November presidential election.

"Let's be clear: Michigan's Nov. 3 general election in Michigan and across the country was the most secure in the nation's history," said Secretary Benson upon the release of the report. "There continues to be no evidence of widespread fraud, as affirmed by state and federal agencies including Attorney General William Barr, the Federal Bureau of Investigation, and the Cybersecurity and Infrastructure Security Agency. If the Trump campaign had any actual evidence of wrongdoing – or genuine suspicion thereof – they could have requested a hand recount of every ballot in the state. They did not, instead choosing to allow shadowy organizations claiming expertise to throw around baseless claims of fraud in an effort to mislead American voters and undermine the integrity of the election. Their actions are a corruption of the courts and the rule of law, as the release of today's report clearly demonstrates."

A lawsuit filed in 13th Circuit Court, *Bailey v Antrim County*, seeks to challenge Antrim County's election results, [posing false claims of fraud](#) and accompanied with a report filled with errors and clear bias.

"Oftentimes, a party will hire an expert witness to support the conclusion that the party wants or needs to reach. It's why we give the other parties in a lawsuit a chance to depose the expert and challenge their qualifications in court," Attorney General Nessel said. "Anyone can have an opinion, but it doesn't necessarily mean the opinion is based on fact or science."

ASOG authored the "preliminary forensic audit," which was made public by the judge today. The group, however, has no apparent expertise in election administration and technology. Their work is limited to the previous release and amplification of other false information and fake documents. [As expected](#), the plaintiff's most recent report on Antrim County is similarly critically flawed, filled with dramatic conclusions without any evidence to support them.

Today's activity comes on the heels of last week's announcement from the Department of State that the Bureau of Elections is planning the most comprehensive set of election audits in the state's history. This will include a statewide risk-limiting audit, several local procedural audits, and a zero-margin risk-limiting-audit of all ballots in Antrim County. The latter, which will be conducted on Thursday, Dec. 17, is expected to confirm that votes cast for president were machine-tabulated correctly. A similar statewide risk-limiting audit demonstrated the accuracy of the state's voting machines following the March 10 presidential primary.

In response to a previously unsigned version of the ASOG report, Michigan Bureau of Elections Director Jonathan Brater made a [preliminary declaration](#) under oath for the court. In his statement, Brater said it was apparent to him "... that the report makes a series of unsupported conclusions, ascribes motives of fraud and obfuscation to processes that are easily explained as routine election procedures or error corrections, and suggests without explanation that elements of election software not used in Michigan are somehow responsible for tabulation or reporting."

There are several legal concerns with the report and testimony submitted in *Bailey v Antrim County*, including the portions provided by Russell Ramsland, one of the "expert" witnesses in the case. A [Detroit Free Press story from Nov. 21](#) quotes Rudy Giuliani as saying Michigan has "over-votes in numerous precincts of 150%, 200% and 300%." Giuliani's source was an affidavit from Ramsland, who is a former Republican congressional candidate. All 19 of the precincts cited in his affidavit are in Minnesota, not Michigan. Ramsland has also [inaccurately stated the voter turnout rate in Detroit](#), saying it was nearly three times higher than it actually was.

The qualifications of those who authored the report are suspect, with no evidence or credentials provided to back up their "expertise." Authors in the report also make unverified and unsupported claims that "fraud," "intentional errors" and "bad faith" decisions made by election officials led

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There are several legal concerns with the report and testimony submitted in Bailey v Antrim County, including the portions provided by Russell Ramsland, one of the plaintiffs. Ramsland's report states that "Giuliani's source" has "over-votes in numerous precincts of 150%, 200% and 300%." Giuliani's source was an affidavit from Ramsland, who is a former Republican congressional candidate. All 19 of the precincts cited in his affidavit are in Minnesota, not Michigan. Ramsland has also [inaccurately stated the voter turnout rate in Detroit](#), saying it was nearly three times higher than it actually was.

The qualifications of those who authored the report are suspect, with no evidence or credentials provided to back up their "expertise." Authors in the report also make unverified and unsupported claims that "fraud," "intentional errors" and "bad faith" decisions made by election officials led them to their conclusions in the report. Moreover, many of their assertions are unsupported by evidence, with some even constituting hearsay and clearly show that the authors lack first-hand knowledge of events.

Michigan Rule of Evidence 702 states that if the court determines that scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify thereto in the form of an opinion or otherwise if (1) the testimony is based on sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case. That has not happened in this case yet.

Past court rulings have found that the trial court has a fundamental duty to ensure that all expert testimony is reliable (Gilbert v DaimlerChrysler Corp), and that the knowledge of the testimony must be more than "subjective belief or unsupported speculation" (Daubert v Merrell Dow Pharmaceuticals). At the conclusion of discovery, the Department of Attorney General will have the opportunity to request that the plaintiff's report be stricken from use in these proceedings.

The public will be able to view the Department of State's official audit of the Antrim County presidential election. Details will be announced prior to the audit's commencement on Thursday, Dec. 17.

[Follow this link to view a copy of Brater's declaration.](#)

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Related News

Board of State Canvassers to meet Dec. 16

Dec. 11 and Dec. 20 meetings of Board of State Canvassers are canceled

Livonia vehicle dealership agrees to fines and penalties, resumed operations Dec. 6

The Michigan Department of State (MDOS) has entered an agreement with LaFontaine Motors of Livonia Inc., in which the vehicle dealership admits to all violations found by MDOS and agrees to accept financial and other penalties.

Department of State takes action against Michigan vehicle dealership

On Dec. 4, the Michigan Department of State (MDOS) suspended the license of LaFontaine Motors of Livonia Inc., also known as LaFontaine Hyundai of Livonia, for imminent harm to public.

St. Johns Secretary of State office closed Dec. 16-20 during move to new site

The Secretary of State office at 1041 South US-27 in St. Johns will permanently close at 5 p.m. Friday, Dec. 13, as it moves across the parking lot to a new site in the Southpoint Mall near Subway and Biggby Coffee.

Secretary Benson testifies in support of Michigan Voting Rights Act at House Elections Committee hearing

Today, Secretary of State Jocelyn Benson testified before the Michigan House Committee on Elections in support of the Michigan Voting Rights Act (MVRA), which will expand voting rights,

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Today, Secretary of State Jocelyn Benson testified before the Michigan House Committee on Elections in support of the Michigan Voting Rights Act (MVRA), which will expand voting rights, strengthen democracy in our state, and make good on the promise of the 15th Amendment to the U.S. Constitution—that no citizen can be denied the right to vote.

Secretary Benson shares resources for National Older Driver Safety Awareness Week

To recognize the start of Older Driver Safety Awareness Week, Dec. 2-6, Secretary of State Jocelyn Benson is sharing resources provided through the Michigan Department of State (MDOS) for residents to stay educated and safe behind the wheel at all ages.

Board of State Canvassers to meet Dec. 2 in Lansing

The Board of State Canvassers will meet at 10 a.m. on Monday, Dec. 2, in Room 1100 of the Binsfeld Office Building, 201 Townsend St. in Lansing.

Michigan Board of State Canvassers certifies the 2024 General Election

The bipartisan Board of State Canvassers today voted unanimously to certify Michigan's 2024 General Election results. Prior to today's state canvassers' meeting, bipartisan canvassing boards in each of Michigan's 83 counties certified the election results in their jurisdictions before the legal deadline.

Board of State Canvassers to meet Nov. 22

The Board of State Canvassers will meet at 10:00 a.m. on Nov. 22 in Room 1100 of the Binsfeld Office Building, 201 Townsend St. in Lansing.

Statements on House passage of bills to restrict firearms at Michigan polling places

Secretary of State Jocelyn Benson, Rep. Penelope Tsernoglou, and Rep. Stephanie Young today issued the following statements on House passage of HB 4127 and HB 4128, restricting firearms at polling locations while voting is taking place:

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